



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 4, 2015

Mr. Richard Krochalis, Regional Administrator
Federal Transit Administration, Region 10
915 Second Avenue, Suite 3142
Seattle, Washington 98174-1002

Mr. Perry Weinberg, Director
Office of Environmental Affairs and Sustainability
Sound Transit
401 South Jackson Street
Seattle, Washington 98104-2826

Dear Mr. Krochalis and Mr. Weinberg:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Lynnwood Link Extension (EPA Region 10 Project Number 11-4128-FTA). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We appreciate FTA's and Sound Transit's ongoing dedication to and support for environmental sustainability. The Lynnwood Link Extension will serve to increase the transportation choices for a significant number of commuters in the Puget Sound metropolitan area and is a positive contribution to the State's effort to address climate change through the reduction of greenhouse gases. We also appreciate the efforts of Sound Transit to avoid and minimize impacts to sensitive environmental and open space resources, while providing transit, which best supports economic plans and travel needs. This has been and continues to be particularly challenging for Segment C of the project where scarce, high value parkland and aquatic resources at Scriber Creek are in close proximity to high intensity planned land uses in Lynnwood.

Wetland impacts

While we recognize the steps that have been taken to reduce impacts to sensitive resources, we do have concerns regarding impacts to the Scriber Creek Wetland Complex, which we hope can be ameliorated with modifications to the Preferred Alternative and through further project planning and design. In response to comments regarding planned land uses, FTA and Sound Transit have included a modified Alternative C3 in Segment C, now identified as the Preferred Alternative. This alternative would result in direct loss of approximately 0.5 more acres of wetland than the previous Alternative C3, and project construction would affect an additional 0.3 acres of wetlands and 0.2 acres of wetland buffer. Although the acreage numbers are small, these additional wetland impacts would occur within and bisect a substantial portion of the Scriber Creek Wetland Complex, a high value Category 2 forested wetland system.

Because the Scriber Creek Wetland Complex has high integrity as a well-functioning ecosystem in a densely populated area, and provides natural open space and other ecosystem services,¹ it could have significant intrinsic value to the City of Lynnwood, its residents, and its businesses. The Scriber Creek Wetland Complex exhibits high levels of ecosystem function and value.² It is one of the few remaining remnants of the natural system in an otherwise dense urban environment. Resources upstream and downstream connect with and benefit from its integrity. Even with the use of work trestles, construction impacts would be invasive, resulting in fragmented habitat and long-term degradation or loss of the forested wetland component.³ These impacts are largely avoidable by incorporating aspects of the previous Alternative C3. With further study and engineering design, it may be feasible to adjust guideway alignment, station location, and/or tail track configuration to better harmonize Alternative C3 with City Center redevelopment plans. We recommend that Sound Transit adjust the Preferred Alternative and project design to improve environmental and community outcomes with respect to these resource impacts.

Wetland mitigation

Individual wetlands and other resource areas that would be adversely affected by project construction and operation would be offset through compensatory mitigation.⁴ To mitigate unavoidable impacts, particularly any impacts to Scriber Creek and/or its wetland complex, we recommend that every effort be made to preserve the Scriber Creek wetland complex. This and other mitigation, such as wetland creation or restoration, should be designed to provide the highest ecological and natural area open space benefits to affected ecosystems and communities. We also recommend that compensatory mitigation be used to improve ecological connectivity of both aquatic and terrestrial habitat corridors in the project area, particularly within Segment C.

Floodplain impacts

In Segment C, the Preferred Alternative and other alternatives would place guideway columns in the Scriber Creek floodplain.⁵ The FEIS states that Sound Transit would provide compensatory floodplain storage, but no further detail is provided about the nature or location of the compensatory storage. We recommend that efforts to provide compensatory flood storage not result in excavation of the Scriber Creek wetlands or otherwise impact the quality and integrity of the wetland complex. Floodplain creation/restoration should occur offsite in areas connected or in close proximity to the wetland complex.

¹ FEIS, p. 4-149 through 4-154.

² Based on July 2014 field delineations, Ecology staff found that the ordinary high water mark of Scriber Creek through the wetland complex is defined as encompassing the entire breadth of the complex (FEIS, p. 4-148).

³ FEIS, p. 4-153, 4-154.

⁴ FEIS, p. 4-154.

⁵ FEIS, p. S-28; p. 4-178, 4-179.

Thank you for the opportunity to review and offer comment on the Lynnwood Link Extension project. We welcome any questions or discussion of these comments. You can reach me at (206) 553-1601 or via electronic mail at Reichgott.christine@epa.gov, or Elaine Somers of my staff at (206) 553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit